



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

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November 2, 2009

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: ECOS Comments on Final Report of RTAC Recommendations

Dear Board members:

ECOS commends the RTAC for what it has accomplished, especially for the consistent focus in their report on (1) transparency, (2) public participation, and (3) accessibility of information for non-technical audiences. ECOS believes it is crucial that targets to be established for a region be the most ambitious achievable for that region and must clearly be actions well beyond business as usual in order to approach compliance with AB-32.

Land use changes, in particular, must be subject to ambitious reduction targets and be aggressively applied, so that benefits are seen before 2035. It is unfortunate that the year 2005 was chosen as the base-line year, instead of an earlier year, as that choice is likely to make it more difficult to meet the ultimate emission reductions required by AB-32.

It is also unfortunate the Committee could not resolve the issue of whether MPOs should be allowed to use the Best Management Practices (BMP) list as the sole method of demonstrating compliance. ECOS strongly recommends that only small MPO regions be permitted to use the BMP list as its sole indicator of compliance and only during the initial round of compliance monitoring. Travel models are not without issues, but they need to be improved rather than ignored.

ECOS supports the recommendation in the RTAC report for collaboration among stakeholders in setting the emission reduction target. However, care must be taken to ensure that the target is as ambitious as possible, even in the face of failure of unanimous consensus of all collaborators. The targets must be based on sound (and publicly available) empirical data/modeling and should not be "watered-down" simply to achieve consensus among the stakeholders.

The RTAC report calls for public participation throughout the process, which ECOS applauds. Public participation throughout the process and true transparency, including modeling transparency, is critical for the success of this legislation. For example, the report refers to a "reasonably tough test" for any potential adjustments from the target made by an MPO. In our view, this "test" must be sufficiently well defined to allow the public to effectively assess MPO compliance with the target.

ECOS strongly supports the recommendation that social equity factors be included as modeling inputs. In addition, ECOS recommends inclusion of environmental factors, such as impacts on habitat, water use, wildlife, air quality, and general environmental protection and sustainability. Maximum financial support should be directed to local governments that prioritize infrastructure investments for infill and compact growth in urbanized areas. Similarly, jurisdictions that plan to build additional low-density, car-oriented infrastructure should expect to receive a corresponding reduction in financial support.

The report indicates that CARB should provide to MPOs the potential benefits of future measures to further increase fuel efficiency and shift the state's transportation fuel mix. Care must be taken with this approach, since "black box" measures utilized in the past to derive air quality benefits have not been realistic and have not been realized. Compliance by local jurisdictions and performance monitoring need to be addressed in more detail and should be made clear to the public to help ensure such compliance.

The funding to implement SB-375 (provided under SB-406) is not adequate. We would have preferred SB-406 to have required an emission-based vehicle registration fee, rather than a straight fee per vehicle. Additional funding to support local jurisdiction implementation will be needed if this program is to be successful. Various funding sources must be found and committed to this effort. The level of public transit funding will be one of the crucial factors determining the success or failure to meet the emission targets. State transit funding that has been redirected to budget shortfall must be restored and additional sources must be secured. In addition, funding sources need to be developed to cover the costs local jurisdictions will necessarily incur in implementing SB-375.

Likewise, it is crucial that the \$1.7 billion in redevelopment funds that were diverted be fully restored and additional funds for redevelopment be made available to jurisdictions planning for smart growth and compact development. It is important to ensure there is sufficient affordable housing in the mix and that this housing is effectively connected to sustainable transportation. The Regional Housing Needs Assessments (RHNA's) need to be coordinated with the Regional Transportation Plans (RTP's). This means that there will need to be incentives and guidance if the housing plans approved by local governments are actually going to meet the RHNA's.

The co-benefits of implementing Sustainable Communities Strategies should receive greater emphasis than provided by the RTAC report. Finally, incentives for lower emissions than those in established targets should be developed as fully as possible.

Sincerely,

ECOS Transportation, Air Quality and Climate Change Committee

A handwritten signature in black ink that reads "Jonathan Ellison". The signature is written in a cursive style with a large, looping initial "J".

By: Jonathan Ellison, Co-Chair

Richard Seyman, Co-Chair